

ZMO LAW PLLC

MEMO ENDORSED.

December 3, 2024

Via ECF and email

Hon. Ona T. Wang
Southern District of New York
US Courthouse, SDNY
40 Foley Square
New York, NY 10007

RE: *Jane Stone v. Annucci (SDNY)*, 20 Civ. 1326 (RA)(OTW)

Dear Judge Wang:

This office represents the Plaintiffs in the above-captioned matter. We write to request that the Court issue four subpoenas for the medical records of four of the Plaintiffs. Counsel has endeavored to get these records, but is facing significant difficulties in large part because these entities have not accepted the standard New York State courts HIPAA release form.

This has caused delays in obtaining the records, as several of the Plaintiffs have unstable housing situations and limited access to printers and other electronic devices.

As such, we are requesting the Court issue the four attached subpoenas. We are further requesting permission to submit the subpoenas under seal, as they contain the Plaintiffs' names, and the specific locations where they have received medical care.

Thank you for your attention to this case.

Very truly yours,

Tess M. Cohen

Tess M. Cohen
Partner

Plaintiffs are directed to file the four referenced subpoenas under seal by December 31, 2024.

Encls. Requested Subpoenas (4)

CC: All Counsel (via ECF)

SO ORDERED.



Ona T. Wang
U.S.M.J.

Dec. 20, 2024